

## UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

February 07, 2025

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

v.

Gerardo Antonio Ramos-Chavez  
AKA Gerardo Ramos  
XXX XXX 486Defendant(s)

BY: \_\_\_\_\_

CM

DEPUTY

Case No. **SA:25-MJ-180****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 6, 2025 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. § 1326(a) &amp; (b)(1)

Illegal Reentry

Penalties: Maximum Penalties: 10 years confinement, \$250,000 Fine or  
Both; 3 years supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

MICHAEL N DRYJA

Digitally signed by MICHAEL N

DRYJA

Date: 2025.02.06 12:40:33 -06'00'

*Complainant's signature*

Michael Dryja, Deportation Officer

*Printed name and title*☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed electronically.Date: February 7, 2025City and state: San Antonio, Texas*Judge's signature*

Honorable Richard B. Farrer, U.S. Magistrate Judge

*Printed name and title*

AFFIDAVIT

Being duly sworn, I declare that the following is true and correct to the best of my knowledge.

My name is Michael Dryja and I am a Deportation Officer with Immigration and Customs Enforcement (ICE) and with whom I have been employed since January 3, 1999. I am authorized by the United States Department of Homeland Security to enforce the Immigration Laws and Regulations of the United States or any other Laws or Regulations designated by the Attorney General or his successor, the Secretary of the Department of Homeland Security.

On July 25, 2024, ICE ERO received information Gerardo Antonio Ramos-Chavez (hereafter RAMOS) re-entered the United States after his removal. ICE ERO Officers initiated an investigation and determined that RAMOS was previously removed to Mexico on August 28, 2019.

On February 6, 2025, ICE ERO officers conducted physical surveillance of specified address, (hereafter "target address") which is located within the Western District of Texas. At the target address, ICE ERO observed an adult male matching the photograph and physical description of RAMOS enter the driver's seat of a pickup truck parked in the driveway.

ICE ERO Officers followed the vehicle and performed a vehicle stop near 5530 W. Military Drive in San Antonio, Texas, within the Western District of Texas. ICE ERO officers made a positive identification of RAMOS and arrested him without incident, RAMOS was then transported to the San Antonio ICE Resident office for processing.

At the ICE ERO office, RAMOS' fingerprints were enrolled and submitted through immigration and FBI databases which verified his identity. The databases also revealed that RAMOS is a citizen or national of Mexico with assigned Alien Registration Number AXX XXX 486. A review of the Alien Registration File for AXX XXX 486 revealed that RAMOS was an alien previously removed from the United States to Mexico on or about August 28, 2019.

Record checks indicate that RAMOS was convicted on August 5, 2019, in Bexar County, Texas for the offense of Possession of a Controlled Substance, 4 grams to 200 grams and sentenced to five (5) years' probation.

Immigration databases also revealed that RAMOS has not been granted permission to reapply for admission from the Attorney General of the United States, or his successor, after removal.

The defendant was advised about his right to a consular notification and the Consulate of Mexico was notified about RAMOS's arrest on February 6, 2025.

**MICHAEL** Digitally signed by  
MICHAEL N DRYJA  
Date: 2025.02.06  
**N DRYJA** 14:10:01 -06'00'

Michael Dryja  
Deportation Officer  
Immigration and Customs Enforcement

Subscribed and sworn before me the 7th day of February 2025.

United States Magistrate Judge  
Honorable Richard B. Farrer